

FILED

APR 23 2019

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

AT 8:30 9:00 AM
WILLIAM T. WALSH
CLERK

UNITED STATES OF AMERICA : Hon. Robert B. Kugler
:
v. : Crim. No. 18-723
:
ALIA AL HUNAITY : 8 U.S.C. § 1325(c)
: 8 U.S.C. § 1324(a)(1)(A)(iii) and
: 1324(a)(1)(B)(i)
: 18 U.S.C. § 1589(a)

SUPERSEDING
INDICTMENT

The Grand Jury in and for the District of New Jersey, sitting at Newark,
charges:

COUNT ONE
(Marriage Fraud)

On or about April 11, 2018, in Hudson County, in the District of New
Jersey and elsewhere, the defendant,

ALIA AL HUNAITY,

did knowingly and unlawfully enter into a marriage with Victim-1, an alien in
the United States, for the purpose of evading a provision of the immigration laws
of the United States.

In violation of Title 8, United States Code, Section 1325(c).

COUNT TWO

(Harboring an Illegal Alien for Private Financial Gain)

From in or around July 2009 through in or around September 2018, in Passaic County and Hudson County, in the District of New Jersey and elsewhere, the defendant,

ALIA AL HUNAITY,

knowing and in reckless disregard of the fact that an alien, namely, Victim-1, had remained in the United States in violation of law, did conceal, harbor, and shield from detection such alien in buildings and other places for the purpose of private financial gain.

In violation of Title 8, United States Code, Sections 1324(a)(1)(A)(iii) and 1324(a)(1)(B)(i).

COUNT THREE

(Forced Labor)

From in or around July 2009 through in or around September 2018, in Passaic County and Hudson County, in the District of New Jersey and elsewhere, the defendant,

ALIA AL HUNAITY,

did knowingly obtain the labor and services of Victim-1 by means of threats of serious harm, the abuse and threatened abuse of law and legal process, and a scheme, plan and pattern intended to cause Victim-1 to believe that if Victim-1 did not perform such labor and services, that Victim-1 would suffer serious harm.

In violation of Title 18, United States Code, Section 1589(a).

FORFEITURE ALLEGATION AS TO COUNT TWO

As a result of committing the harboring aliens offense charged in Count Two of this Superseding Indictment, the defendant,

ALIA AL HUNAITY,

shall forfeit to the United States, pursuant to Title 18, United States Code, Section 982(a)(6)(A)(ii) any and all property constituting or derived from any proceeds the defendant obtained directly or indirectly as a result of the said violation, and any and all property used or intended to be used in any manner or part to commit and to facilitate the commission of the violation alleged in Count Two of this Superseding Indictment.

FORFEITURE ALLEGATION AS TO COUNT THREE

As a result of committing the forced labor offense charged in Count Three of this Superseding Indictment, the defendant,

ALIA AL HUNAITY,

shall forfeit to the United States, pursuant to Title 18, United States Code, Section 1594(d), any property, real or personal, constituting or derived from any proceeds the defendant obtained, directly or indirectly, as a result of the said offense, and any property, real or personal, involved in, used, or intended to be used to commit or to facilitate the commission of the offense alleged in Count Three of this Superseding Indictment, and any property traceable to such property.

SUBSTITUTE ASSETS PROVISION
(Applicable to All Forfeiture Allegations)

If any of the property described above, as a result of any act or omission of the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty,

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 18, United States Code, Section 982(b)(1) and Title 28, United States Code, Section 2461(c), to seek forfeiture of any other property of such defendant up to the value of the forfeitable property described above.

A TRUE BILL. —

FOREPERSON U —


CRAIG CARPENITO
United States Attorney

CASE NUMBER: 18-723 (RBK)

**United States District Court
District of New Jersey**

UNITED STATES OF AMERICA

v.

ALIA AL HUNAITY

SUPERSEDING INDICTMENT FOR

8 U.S.C. § 1325(c)
8 U.S.C. § 1324(a)(1)(A)(iii) and 1324(a)(1)(B)(i)
18 U.S.C. § 1589(a)

A True Bill.

Foreperson

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(Ed. 1/97)